

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Case No. 1:18-cr-00681

v.

NOTICE OF MOTION

JEAN BOUSTANI,
et al.

Defendants.
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and accompanying Exhibits 1-5, Defendant Manuel Chang, through his undersigned counsel, hereby moves this Court before the Honorable Nicholas G. Garaufis at the United States District Courthouse, 225 Cadman Plaza East Brooklyn, New York 11201, for an order granting his motion to suppress evidence and return his 2018 Cellphone (as defined in the accompanying memorandum of law), and for such other and further relief as the Court may deem just and proper.

Dated: January 19, 2024
New York, New York

Respectfully submitted,
FORD O'BRIEN LANDY LLP



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